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September 17, 2015

VIA ECF FILING AND E-MAIL

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, NY 10004

Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG)

Dear Judge Gerber:

We represent Wilmington Trust Company, as trustee for and administrator of the Motors Liquidation Company GUC Trust (the "GUC Trust"). We write in connection with the evidentiary hearing scheduled for September 22, 2015 (the "Stay Hearing"). Pursuant to the Court's Case Management Order #3 dated April 22, 2014 [ECF No. 12625], the GUC Trust hereby advises the Court as follows:

1. The GUC Trust and Co-Designated Counsel for the Ignition Switch Plaintiffs and Non-Ignition Switch Plaintiffs ("Designated Counsel," and collectively with the GUC Trust, the "Parties") have filed *Stipulations of Fact Regarding Request for Stay* [ECF No. 13441].

2. The GUC Trust has filed a declaration of its expert witness, Andrew Scruton, and the exhibits thereto. See ECF No. 13442.

3. The Parties have conferred about the presentation of expert testimony and have agreed that Mr. Scruton, who will be the sole witness at the Stay Hearing, may provide live direct testimony.

4. Aside from the foregoing filings, the Parties do not intend to submit any trial exhibits for use at the Stay Hearing.

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Should Your Honor have any questions about the Stay Hearing, please do not hesitate to contact me.

Respectfully submitted,



Lisa H. Rubin

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